

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA :
:
v. : No. 19-CR-669
CHRISTOPHER JORDAN, : Hon. Edmond E. Chang
:
Defendant. :

Joint Motion to Reschedule Sentencing Hearing

The United States and defendant Christopher Jordan, each by and through their undersigned counsel, respectfully request that the Court reset the deadline for the parties to file their sentencing cross-responses to August 25, 2023, and reschedule the sentencing hearing for Mr. Jordan to September 8, 2023, at 9:30 a.m. The parties have consulted with the Court's Deputy and understand that the Court is available to hold the sentencing hearing on September 8. In support of this motion, the parties state as follows:

1. Mr. Jordan's sentencing hearing is currently scheduled for August 31, 2023, with the parties' sentencing memoranda due on July 25, 2023, and cross-responses due on August 9, 2023. *See* ECF No. 869.
2. On June 5, 2023, the Court reset the sentencing hearings for co-defendants Gregg Smith and Michael Nowak to August 17 and 18, 2023, respectively. *See* ECF Nos. 887 & 888. In addition, the Court has scheduled a joint hearing for defendants Smith and Nowak on August 17, 2023, to address arguments

related to the appropriate loss calculation methodology applicable to their Sentencing Guidelines calculations. *Id.*

3. Prof. Kumar Venkataraman conducted the United States' loss calculation for defendants Jordan, Smith, and Nowak, and Prof. Venkataraman applied substantially the same methodology in each of those loss calculations. Given that, the parties propose that the deadline for their sentencing cross-responses be reset to August 25, 2023 (*i.e.*, one week after the joint hearing on loss calculation and the sentencing for defendants Smith and Nowak). The parties respectfully submit that this later deadline for the cross-responses will allow the parties to address the Court's rulings related to Prof. Venkataraman's loss calculations as well as the sentences imposed on defendants Smith and Nowak. The parties are not seeking to move the July 25, 2023, deadline for the submission of the parties' sentencing memoranda.

4. In addition, the parties respectfully propose adjourning Mr. Jordan's sentencing date approximately one week to September 8, 2023, at 9:30 a.m. to provide the Court with additional time to consider the parties' cross-responses prior to Mr. Jordan's sentencing hearing.

Accordingly, the parties respectfully request that the Court (i) reset the deadline for the parties to file their sentencing cross-responses to August 25, 2023, and (ii) reschedule the sentencing hearing for Mr. Jordan to September 8, 2023, at 9:30am.

Dated: June 20, 2023

Respectfully submitted,

/s/ James J. Benjamin, Jr.

James J. Benjamin, Jr.
Parvin D. Moyne
Anne M. Evans
AKIN GUMP STRAUSS HAUER &
FELD LLP
One Bryant Park
New York, New York 10036
(212) 872-1000

Megan Cunniff Church
MOLOLAMKEN LLP
300 N. LaSalle Street
Suite 5350
Chicago, Illinois 60654
(312) 450-6700

Counsel for Christopher Jordan

GLENN S. LEON
Chief, Fraud Section
Criminal Division
U.S. Department of Justice

/s/ Matthew F. Sullivan

Matthew F. Sullivan, Trial Attorney
Christopher Fenton, Trial Attorney
Lucy B. Jennings, Trial Attorney
Criminal Division, Fraud Section
U.S. Department of Justice
(202) 578-6583
matthew.sullivan2@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

I, Matthew F. Sullivan, hereby certify that on June 20, 2023, I caused the foregoing filing to be electronically filed with the Clerk of Court by using the Court's electronic filing system, which will automatically send a notice of electronic filing to the parties who have entered an appearance in this case.

*/s/**Matthew F. Sullivan*

Matthew F. Sullivan
Trial Attorney
U.S. Department of Justice